



# KREINDLER & KREINDLER LLP

100 Park Avenue  
New York, NY 10017-5590  
(212) 687-8181  
Fax: (212) 972-9432  
www.kreindler.com

Harry E. Kreindler (1919-1984)  
Lee S. Kreindler (1949-2003)  
Marc S. Moller  
Steven R. Pounian  
James P. Kreindler  
David C. Cook  
David Beekman  
Noah H. Kushlefsky  
Robert J. Spragg  
Brian J. Alexander  
Justin T. Green  
Andrew J. Maloney III  
Daniel O. Rose

Francis G. Fleming  
Paul S. Edelman  
Milton C. Sincoff  
John J. Veth\*\*  
Counsel

Susan D. Bainnson  
William O. Angelle  
Michael R. Sherwin  
Hilary B. Taylor  
Elizabeth Crotty  
Megan Benett

California Office  
Tetchen M. Nelson\*  
Stuart R. Fraenkel\*  
Mark I. Labaton\*

Gabriel Barenfeld\*

Massachusetts Office  
Anthony Tarricone\*

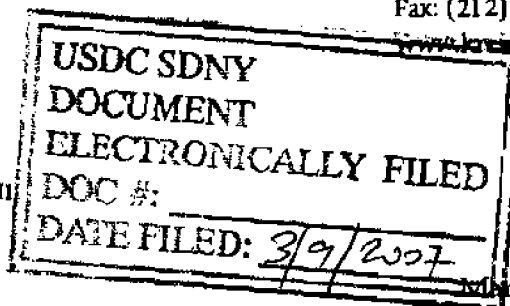
Susan A. Friery, M.D.\*  
James D. Goiz\*  
Joseph P. Musacchio\*

\*Admitted in CA only

\*Admitted in MA only

\*Admitted in MA & DC only

\*Resident in CA office



MEMO ENDORSED

March 9, 2007

Via Facsimile (212) 805-6724

Honorable Frank Maas  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 740  
New York, New York 10007-1312

Nothing like waiting  
until the 11th hour!

The conference is  
adjourned to 3/23 at  
10 AM.

Follows, USMI,

Re: In re Terrorist Attacks on September 11, 2001 v. NCB  
03 MDL 1570 (RCC)(FM)

3/9/07

Dear Judge Maas:

We are scheduled to appear before Your Honor to resolve a discovery dispute between plaintiffs and defendant NCB on March 12 at 5:30 a.m. Yesterday I was requested by my co-counsel at the Motley Rice firm which represents the Burnett plaintiffs, if we could adjourn the conference for at least one week in order that they attend and be heard from. Last night and this morning I discussed this request with Ron Liebman, Patton Boggs' counsel for NCB and he has no objection to the requested adjournment. We tried to reach your law clerk, Peter Altman this morning, and only now learned he was out today.

The three lawyers who would appear and argue the issues therefore respectfully request we reschedule the conference for March 22nd if that is convenient for the Court.<sup>1</sup> If it is inconvenient for the Court, the parties request you consider a date after the 22nd.

As Monday is fast approaching and Mr. Liebman would have to travel from Washington, D.C. for the Monday afternoon conference, the parties respectfully request a response as soon as possible.

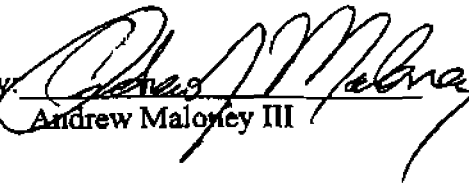
<sup>1</sup> I am scheduled to appear before Judge Cederbaum on the 22nd at 10:45 a.m. for a Case Management Conference that should last only 30 minutes.

March 9, 2007  
Page 2

Thank you Your Honor for considering this last minute request, and we apologize for any inconvenience.

Sincerely,

KREINDLER & KREINDLER LLP  
*Counsel for Ashton*

By:   
Andrew Maloney III

cc: Ron Liebman  
Mitchell Berger  
Counsel for NCB

Plaintiffs Executive Committee